

Exhibit 23

Highly Confidential - Subject to Further Confidentiality Review

Page 1

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

- - -

IN RE: NATIONAL : HON. DAN A.
PRESCRIPTION OPIATE : POLSTER
LITIGATION :
:
APPLIES TO ALL CASES : NO.
: 1:17-MD-2804
:

- HIGHLY CONFIDENTIAL -

SUBJECT TO FURTHER CONFIDENTIALITY REVIEW

- - -

February 15, 2019

- - -

Videotaped deposition of
GEORGE STEVENSON, taken pursuant to
notice, was held at the offices of
McCarter & English, LLP, 1600 Market
Street, Philadelphia, Pennsylvania,
beginning at 9:11 a.m., on the above
date, before Michelle L. Gray, a
Registered Professional Reporter,
Certified Shorthand Reporter, Certified
Realtime Reporter, and Notary Public.

- - -

GOLKOW LITIGATION SERVICES
877.370.3377 ph | 917.591.5672 fax
deps@golkow.com

Highly Confidential - Subject to Further Confidentiality Review

<p style="text-align: right;">Page 70</p> <p>1 description of your time at Endo?</p> <p>2 A. Yes.</p> <p>3 Q. Can you just explain to me,</p> <p>4 when it refers here to marketing in the</p> <p>5 generics business, what did that mean,</p> <p>6 when you were at Endo?</p> <p>7 A. It doesn't mean -- there's a</p> <p>8 difference -- what it means is that it</p> <p>9 mostly deals with the pricing and getting</p> <p>10 business into accounts. It's not what</p> <p>11 normally is referred to as marketing like</p> <p>12 on the brand side where there's</p> <p>13 promotion. There's no promotional in</p> <p>14 generics because you're competing against</p> <p>15 yourself. There's normally no more than</p> <p>16 one. So there's no sense in promotion.</p> <p>17 There's no sales -- there's no sales, you</p> <p>18 know, paraphernalia that's given out.</p> <p>19 There's no representation to doctors.</p> <p>20 On the brand side, they have</p> <p>21 thousands or hundreds or whatever number</p> <p>22 of sales reps that are calling</p> <p>23 physicians. On generics, we had three</p> <p>24 national account executives.</p>	<p style="text-align: right;">Page 72</p> <p>1 earlier, helped develop those, or</p> <p>2 developed those, based on the</p> <p>3 FDA-approved label, okay, so -- otherwise</p> <p>4 they can get in big trouble.</p> <p>5 So you can only promote</p> <p>6 what's on the label. You cannot promote</p> <p>7 anything other than what's on the label.</p> <p>8 Q. Right.</p> <p>9 A. So that's what they do.</p> <p>10 Yes.</p> <p>11 Q. All right. And just to make</p> <p>12 sure we are on the same page on promoting</p> <p>13 according to the label. I mean, I've</p> <p>14 heard the phrase that the label defines</p> <p>15 the product, is that something you've</p> <p>16 heard?</p> <p>17 MS. VANNI: Object to form.</p> <p>18 THE WITNESS: Yeah.</p> <p>19 BY MS. SCULLION:</p> <p>20 Q. Yeah?</p> <p>21 A. I would say some people use</p> <p>22 that phrase, yeah.</p> <p>23 Q. Okay. And -- and it's very</p> <p>24 clear that a company cannot promote its</p>
<p style="text-align: right;">Page 71</p> <p>1 So marketing and generics is</p> <p>2 completely different than what is</p> <p>3 normally involved in the brand; however,</p> <p>4 the marketing is, make sure people know</p> <p>5 you have the product, that you're coming</p> <p>6 with the product. And it's more getting</p> <p>7 the product placed in the trade accounts,</p> <p>8 as we described them earlier.</p> <p>9 Essentially in generics,</p> <p>10 that's what marketing is.</p> <p>11 Q. Okay. So if I understand</p> <p>12 you correctly, on the brand side, there's</p> <p>13 marketing that takes the form of sales</p> <p>14 representatives, for example, going out</p> <p>15 to detail healthcare providers about the</p> <p>16 product, correct?</p> <p>17 A. Correct.</p> <p>18 Q. Okay. And they might be</p> <p>19 using specific promotional materials in</p> <p>20 the course of doing that?</p> <p>21 A. Yeah. They would use</p> <p>22 specific promotional materials, which are</p> <p>23 very strictly controlled. Where the</p> <p>24 scientific people, we talked about</p>	<p style="text-align: right;">Page 73</p> <p>1 product inconsistent with what's in the</p> <p>2 label approved by the FDA, correct?</p> <p>3 MS. VANNI: Object to form.</p> <p>4 THE WITNESS: Yes.</p> <p>5 BY MS. SCULLION:</p> <p>6 Q. Okay. To do that is called</p> <p>7 off-label marketing, correct?</p> <p>8 A. Yes.</p> <p>9 Q. It's unlawful, correct?</p> <p>10 MS. VANNI: Object to form.</p> <p>11 THE WITNESS: Yes.</p> <p>12 BY MS. SCULLION:</p> <p>13 Q. Would you agree that it's</p> <p>14 also unethical?</p> <p>15 MS. VANNI: Object to form.</p> <p>16 THE WITNESS: It's a</p> <p>17 judgment call. I guess so. I --</p> <p>18 I don't know. I wasn't involved</p> <p>19 in it.</p> <p>20 BY MS. SCULLION:</p> <p>21 Q. Okay.</p> <p>22 A. So, you know, in every</p> <p>23 Pharma company I worked at, they went to</p> <p>24 great lengths, okay. I was part of the</p>

19 (Pages 70 to 73)